

**BLANK ROME LLP**

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Attorneys for Defendants, Counterclaimants, and  
Third Party Plaintiffs PCJV USA, LLC, PCI  
TRADING LLC, POTATO CORNER, LA  
GROUP, LLC, GK CAPITAL GROUP, LLC,  
NKM CAPITAL GROUP, LLC and GUY  
KOREN, and Defendants J & K AMERICANA,  
LLC, J&K LAKEWOOD, LLC, J&K  
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J  
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,  
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING , LLC, a  
Delaware limited liability company; GUY  
KOREN, an individual; POTATO CORNER  
LA GROUP, LLC, a California limited  
liability company; NKM CAPITAL GROUP,  
LLC, a California limited liability company;  
J & K AMERICANA, LLC, a California  
limited liability company; J&K  
LAKEWOOD, LLC, a California limited  
liability company; J&K VALLEY FAIR,  
LLC, a California limited liability company;  
J & K ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS, LLC, a  
California, limited liability company; GK  
CERRITOS, LLC, a California, limited  
liability company; J&K PC TRUCKS, LLC,  
a California limited liability company; and,

Case No. 2:24-CV-04546-SB(AGRx)

*Hon. Stanley Blumenfeld, Jr.*

**JOINT STATEMENT OF  
COMPLETED DISCOVERY IN  
RESPONSE TO DKT. NO. 254**

Complaint Filed: May 31, 2024  
Trial Date: August 18, 2025

1 GK CAPITAL GROUP, LLC, a California  
2 limited liability company and DOES 1  
3 through 100, inclusive,

Defendants.

4 PCJV USA, LLC, a Delaware limited  
5 liability company; PCI TRADING LLC, a  
6 Delaware limited liability company;  
7 POTATO CORNER LA GROUP LLC, a  
8 California limited liability company; GK  
9 CAPITAL GROUP, LLC, a California  
10 limited liability company; NKM CAPITAL  
11 GROUP LLC, a California limited liability  
12 company; and GUY KOREN, an individual,

Counter-Claimants,

13 v.

14 SHAKEY'S PIZZA ASIA VENTURES,  
15 INC, a Philippines corporation,

Counter Defendant.

16 PCJV USA, LLC, a Delaware limited  
17 liability company; PCI TRADING LLC, a  
18 Delaware limited liability company;  
19 POTATO CORNER LA GROUP LLC, a  
20 California limited liability company; GK  
21 CAPITAL GROUP, LLC, a California  
22 limited liability company; NKM CAPITAL  
23 GROUP LLC, a California limited liability  
24 company; and GUY KOREN, an individual,

Third Party Plaintiffs,

25 v.

26 PC INTERNATIONAL PTE LTD., a  
27 Singapore business entity; SPAVI  
28 INTERNATIONAL USA, INC., a California  
corporation; CINCO CORPORATION, a  
Philippines corporation; and ROES 1 through  
10, inclusive,

Third Party Defendants.

Pursuant to Dkt. No. 254, the parties submit the following joint table identifying all discovery completed, including the initial disclosures exchanged. Also, attached hereto as (1) **Exhibit A** is a true and correct copy of the parties' jointly filed Rule 26(f) Report; (2) **Exhibit B** is a true and correct copy of Plaintiff's initial disclosures served on February 14, 2025; (3) **Exhibit C** is a true and correct copy of Defendants', Counterclaimants', and Third Party Plaintiffs' ("PCJV USA Parties") initial disclosures served on February 28, 2025; and (4) **Exhibit D** is a true and correct copy of PCJV USA Parties' supplemental initial disclosures served on March 14, 2025.

<u><b>Date</b></u>	<u><b>Pty</b></u>	<u><b>Event</b></u>
8/27/24	Plaintiff and Defendants	Plaintiff and Defendants filed a joint Rule 26(f) Report. <b>Exhibit A.</b>
12/6/24	Defendant PCJV USA, LLC	Defendant PCJV USA, LLC propounded Interrogatory No. One, Set One, on Plaintiff.
12/6/24	Defendant PCJV USA, LLC	Defendant PCVJ USA, LLC propounded Requests for Production of Documents, Set One, on Plaintiff.
1/16/25	Plaintiff	Plaintiff served responses to Defendant PCJV USA, LLC's Interrogatory No. One, Set One.
1/21/25	Plaintiff	Plaintiff served responses to Defendant PCJV USA, LLC's Requests for Production of Documents, Set One.
2/11/25	Defendant PCJV USA, LLC	Defendant PCJV USA, LLC propounded Interrogatories, Set Two, on Plaintiff.
2/11/25	Defendant PCJV USA, LLC	Defendant PCJV USA, LLC propounded Requests for Production of Documents, Set Two, on Plaintiff.
2/14/25	Plaintiff	Plaintiff served Rule 26(A)(1) disclosures on Defendants. <b>Exhibit B.</b>
2/14/25	Plaintiff	Plaintiff propounded Requests for Production of Documents, Set One, on Defendant PCJV USA, LLC.

1	2/28/25	PCJV USA Parties	PCJV USA Parties served Plaintiff, Counter Defendants, and Third Party Defendants with Rule 26(A)(1) & (2) disclosures. <b>Exhibit C.</b>
2	3/13/25	Plaintiff	Plaintiff served responses to PCJV USA, LLC's Requests for Production of Documents, Set Two.
3	3/14/25	PCJV USA Parties	PCJV USA Parties served Plaintiff, Counter Defendants, and Third Party Defendants with supplemental Rule 26(A) disclosures. <b>Exhibit D.</b>
4	3/17/25	Defendant PCJV USA, LLC	Defendant PCJV USA, LLC served responses to Plaintiff's Requests for Production of Documents, Set One.
5	3/24/25	Plaintiff	Plaintiff served responses to Defendant PCJV USA, LLC's Interrogatories, Set Two.
6	4/8/25	Plaintiff	Plaintiff sent counsel for PCJV USA Parties a subpoena for production of documents at Jason A. Engel's deposition.
7	4/8/25	Plaintiff	Plaintiff served a supplemental response to Defendant PCJV USA, LLC's Interrogatory No. One, Set No. One.
8	4/9/25	PCJV USA Parties	PCJV USA Parties served Plaintiff with objections to a subpoena for production of documents at Jason A. Engel's deposition.
9	4/10/25	Plaintiff	Plaintiff deposed Jason A. Engel.

1 DATED: August 15, 2025 **BLANK ROME LLP**

2  
3 By: /s/ Todd M. Malynn

4 Todd M. Malynn

5 Arash Beral

6 Jamison T. Gilmore

7 Attorneys for Defendants, Counterclaimants,  
8 and Third Party Plaintiffs PCJV USA, LLC,  
9 PCI TRADING LLC, POTATO CORNER,  
10 LA GROUP, LLC, GK CAPITAL GROUP,  
11 LLC, NKM CAPITAL GROUP, LLC and  
12 GUY KOREN, and Defendants J & K  
13 AMERICANA, LLC, J&K LAKEWOOD,  
14 LLC, J&K OAKRIDGE, LLC, J&K  
15 VALLEY FAIR, LLC, J & K ONTARIO,  
16 LLC, J&K PC TRUCKS, LLC, HLK  
17 MILPITAS, LLC, and GK CERRITOS, LLC

18  
19 DATED: August 15, 2025 **FOX ROTHSCHILD LLP**

20  
21 By: /s/ Matthew Follett

22 Michael D. Murphy

23 Matthew Follett

24 Fox Rothschild LLP

25 Attorneys for Plaintiff and Counterclaim  
26 Defendant, and Third Party Defendants  
27  
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**ATTESTATION OF E-FILED SIGNATURE**

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Todd M. Malynn, hereby attest that I have obtained concurrence in the filing of this document from the other signatories to this document. I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

DATED: August 15, 2025

**BLANK ROME LLP**

By: /s/ Todd M. Malynn

Todd M. Malynn

Arash Beral

Jamison T. Gilmore

Attorneys for Defendants, Counterclaimants,  
and Third Party Plaintiffs PCJV USA, LLC,  
PCI TRADING LLC, POTATO CORNER,  
LA GROUP, LLC, GK CAPITAL GROUP,  
LLC, NKM CAPITAL GROUP, LLC and  
GUY KOREN, and Defendants J & K  
AMERICANA, LLC, J&K LAKEWOOD,  
LLC, J&K OAKRIDGE, LLC, J&K  
VALLEY FAIR, LLC, J & K ONTARIO,  
LLC, J&K PC TRUCKS, LLC, HLK  
MILPITAS, LLC, and GK CERRITOS,  
LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 15, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.  
Executed on August 15, 2025.

By: /s/ AJ Cruickshank